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JAP:BTK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

COLLETE STEPHANIE GRANT,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SCOTT SALAMON, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security ("DHS"), Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about May 18, 2015, within the Eastern District of New York and elsewhere, the defendant COLLETE STEPHANIE GRANT did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:¹

1. On or about May 18, 2015, the defendant COLLETE STEPHANIE GRANT arrived at John F. Kennedy International Airport in Queens, New York, aboard Copa Airlines flight 808 from Panama City, Panama.


¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. The defendant COLLETE STEPHANIE GRANT was selected for a Customs and Border Protection ("CBP") enforcement examination. Upon a search of the defendant's bag, a DHS CBP Officer found a package wrapped in carbon paper that contained a white-powdery substance that field-tested positive for cocaine. Upon a further search of the defendant's belongings, additional amounts of cocaine were recovered from her pocketbooks, shoes, purses, and curtains that she was carrying in a bag.

3. The total amount of cocaine that was recovered from the defendant's belongings was approximately 4.2 kilograms.

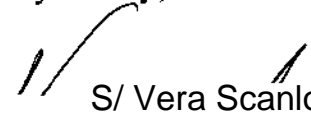
WHEREFORE, your deponent respectfully requests that the defendant COLLETE STEPHANIE GRANT be dealt with according to law.

Dated: Brooklyn, New York
May 18, 2015



SCOTT SALAMON
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
18th day of May, 2015



S/ Vera Scanlon

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK